IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Norfolk Division In Admiralty

In the Matter of COEYMANS MARINE TOWING, LLC D/B/A CARVER MARINE TOWING as Owner and Operator of M/T Mackenzie Rose, (IMO No. 8968765), *et al.*

Civil Action No. 2:24-cv-00490-MSD-LRL

REQUEST FOR ORAL ARGUMENT

Claimants/Respondents Norfolk and Portsmouth Belt Line Railroad Company ("NPBL") and Evanston Insurance Company ("Evanston"), by counsel, pursuant to Local Civil Rule 7(E), request oral argument on the following pending motions: 1) NPBL & Evanston's Joint Motion to Compel Inspection of the M/T Mackenzie Rose and for Sanctions (ECF Doc 67); 2) NPBL & Evanston's Motion for Relief Under Rules 30 and 37 (ECF Doc 69), and 3) Petitioner's Motion for Protective Order (ECF Doc 71).

NPBL and Evanston request an expedited hearing date for these motions. The issues set forth in the Motions have been fully briefed by the parties.

Dated: August 6, 2025.

NORFOLK AND PORTSMOUTH BELT LINE RAILROAD COMPANY

By: /s/James L. Chapman, IV
James L. Chapman, IV, VSB No. 21983
W. Ryan Snow, VSB No. 47423
Mackenzie R. Pensyl, VSB No. 100012
Crenshaw, Ware & Martin, P.L.C.
150 W. Main Street, Suite 1923
Norfolk, Virginia 23510
Telephone: (757) 623-3000

Document 81

Facsimile: (757) 623-5735 jchapman@cwm-law.com wrsnow@cwm-law.com mpensyl@cmw-law.com

Counsel for Norfolk and Portsmouth Belt Line Railroad Company

EVANSTON INSURANCE COMPANY, a/s/o NORFOLK AND PORTSMOUTH BELT LINE RAILROAD COMPANY

/s/ Mark C. Nanavati

Mark C. Nanavati, VSB No. 38709 G. Christopher Jones, Jr., VSB No. 82260 SINNOTT, NUCKOLS & LOGAN, P.C. 13811 Village Mill Drive Midlothian, Virginia 23114 (804) 893-3866 (Nanavati) (804) 378-2610 (Facsimile) mnanavati@snllaw.com ciones@snllaw.com

Zachary M. Jett, VSB No. 93285 BUTLER WEIHMULLER KATZ CRAIG LLP 11525 N. Community House Road, Ste 300 Charlotte, North Carolina 28277 (704) 543-2321 (Telephone) (704) 543-2324 (Facsimile) zjett@butler.legal

Counsel for Evanston Insurance Company, a/s/o Norfolk and Portsmouth Belt Line Railroad Company

CERTIFICATE OF SERVICE

Document 81

I certify that on this 6th day of August 2025 a true and correct copy of the foregoing was served on parties via CM/ECF electronic filing system upon the following:

Harold L. Cohen. Esq. VSB No. 98148 CLYDE & CO US LLP 1221 Brickell Ave #1600 Miami, Florida 33131 (202) 747-5108 (202) 747-5150 Harry. Cohen@clydeco.us

James H. Rodgers, Esq. (pro hac vice) CLYDE & CO US LLP The Chrysler Building 405 Lexington Avenue New York, New York 10174 (212) 702-6771 (212) 710-3950 James.Rodgers@clydeco.us

Rachel Werner, Esq. (pro hac vice) CLYDE & CO US LLP One N. Central Avenue, Ste 1030 Pheonix, Arizona 85004 (480) 746-4580 (480) 746-4569 Direct (480) 746-4556 Fax Rachel.werner@clydeco.us Michael Roman, Esq.
Dawn Johnson, Esq.
Siobhan Murphy, Esq.
CLYDE & CO US LLP
30 S. Wacker Drive, Ste 2600
Chicago, IL 60606
Tel No.: (312) 635-6971
Fax No.: (312)635-6950
Michael.Roman@clydeco.us
Dawn.Johnson@clydeco.us
Siobhan.murphy@clydeco.us
Counsel for Coeymans Marine
Towing, LLC,
d/b/a Carver Marine Towing

James Morrissey (via electronic and regular mail)
4723 Baywood Drive
Lynnhaven, FL 32444
(850) 901-3893
jdmorrissey15@gmail.com

/s/ James L. Chapman, IV